

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VIRGINIA GIUFFRE,

Plaintiff,

v.

ALAN DERSHOWITZ,

Defendant.

ALAN DERSHOWITZ,

Counterclaim Plaintiff,

v.

VIRGINIA L. GIUFFRE,

Counterclaim Defendant.

Civil Action No. 1:19-cv-3377 (LAP)

**ADDENDUM TO
AGREED PROTECTIVE ORDER**

THIS MATTER comes before the Court pursuant to a joint motion by Defendant Alan Dershowitz and Plaintiff Virginia Giuffre for an Addendum to the Protective Order in order to designate as “Confidential” the settlement agreement from *Dershowitz v. Netflix, Inc., et al.*, Civil Action No. 21-21961 (Southern District of Florida) (the “*Netflix Settlement Agreement*”). The Court having considered the motion and other matters of record herein, and it appearing to the Court and the Court finding that given that the *Netflix Settlement Agreement* is by its terms required to be kept confidential; it further appearing to the Court that the interests of justice require the confidentiality of the *Netflix Settlement Agreement* be maintained; and it further appearing to the Court and the Court finding that it is in the public interest to allow the production of the *Netflix Settlement Agreement* in this litigation, that the need for disclosure outweighs any individual’s

privacy rights, and that the protections afforded under the Protective Order and this Addendum are adequate to guard the confidentiality of this information.

IT IS, THEREFORE, ORDERED with the consent of the parties that an Addendum to the Protective Order be entered for the purposes of assuring the confidentiality of the *Netflix Settlement Agreement*, as follows:

1. The Protective Order in this action as entered on December 21, 2020¹ will govern the production of the *Netflix Settlement Agreement*.
2. The *Netflix Settlement Agreement* may be designated “confidential” pursuant to the Protective Order.
3. Pursuant to paragraph 15 of the Protective Order in this action, the signatories to the *Netflix Settlement Agreement* may petition the Court to restrict the use at trial of the *Netflix Settlement Agreement*.

¹ This Addendum incorporates any subsequent modifications to this Protective Order agreed to by the parties or entered by the Court.

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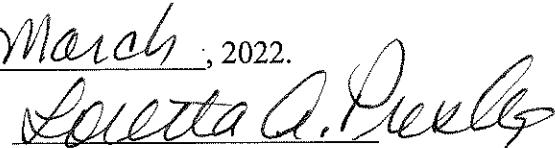
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SO ORDERED AND SIGNED this 29th day of

March, 2022.



Hon. Loretta A. Preska
Senior United States District Judge